

**CONTINUATION OF APPLICATION FOR A CRIMINAL COMPLAINT
AND ARREST WARRANT**

I, Clayton T. Schultz, being duly sworn, depose and state as follows:

INTRODUCTION, AGENT BACKGROUND, AND PURPOSE OF THE WARRANT

1. The facts of this case, as more fully detailed below, reveal that Edgar OROZCO-ESTRADA, a native and citizen of Mexico, was previously removed from the United States, subsequent to a conviction for commission of an aggravated felony, and later reentered the United States without permission at an unknown date and unknown location.

2. I am familiar with the information contained in this continuation based upon the investigation I have conducted and based on information provided to me by other law enforcement officers.

3. The facts in this continuation come from my personal observations, my training and experience, and information obtained from other agents and witnesses. I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause.

4. I am a Deportation Officer with Immigration and Customs Enforcement (ICE) out of the Grand Rapids, Michigan office and have been with ICE since June of 2020. Prior to becoming a Deportation Officer, I was employed by Customs and Border Protection, Office of Border Patrol as a Border Patrol Agent. In 2011 I attended and completed the Border Patrol Academy at the Federal Law Enforcement Training Center in Artesia, New Mexico. This twenty-week academy included training in criminal

investigations and case management, constitutional law, federal criminal law, interviewing, search and seizure, investigating drug offenses, and conducting surveillance operations. It also included training in immigration law, determination of U.S. citizenship, immigration statutory authority, customs law, investigative methods of drug smuggling, human smuggling, and human trafficking. I have received additional training as a Deportation Officer at the Federal Law Enforcement Training Center in Charleston, South Carolina. These nine weeks of training included training in criminal investigations to include fraud, identity theft, federal immigration violation, and federal firearms violations.

5. This continuation contains information necessary to support a finding of probable cause to charge Edgar OROZCO-ESTRADA for a violation of 8 U.S.C. 1326(a) & (b)(2), which makes it a crime for any alien that has been denied admission, excluded, deported, or removed or has departed the United States while an order of exclusion, deportation, or removal, is outstanding, and thereafter enters, or is at any time found in, the United States.

6. OROZCO-ESTRADA is subject to enhanced sentencing because his removal was subsequent to conviction of an aggravated felony offense. 8 U.S.C. § 1326(b)(2). An aggravated felony offense is defined to include a crime related to the Murder, Rape or Sexual Abuse of a Minor. 8 U.S.C. § 1101(a)(43)(A).

FACTS ESTABLISHING PROBABLE CAUSE

7. On or about January 30, 2024, OROZCO-ESTRADA was removed from

the United States via the Brownsville, TX Port of Entry. Prior to his removal, he was provided notice of the requirement that he obtain consent from the Secretary of Homeland Security prior to reentering or applying for readmission to the United States. A search of his alien administrative file showed no such application or authorization.

8. On or about January 15, 2020, OROZCO-ESTRADA was found guilty of Criminal Sexual Conduct 3rd Degree and Criminal Sexual Conduct 4th Degree Force/Coercion in case number 2019003546-FH out of the Second Circuit Court County of Berrien in the State of Michigan. These offenses were committed against a victim under the age of 18 and in violation of MCL 750.520d and 750.520e(1)(a). OROZCO-ESTRADA was sentenced to an incarceration term of 48 to 180 months and 63 days respectively, these sentences to run concurrently. He was removed immediately following his term of incarceration.

9. Immigration and Customs Enforcement (ICE) received information about an illegal re-entry by OROZCO-ESTRADA in February of 2025. On March 27, 2025, ICE Enforcement and Removal Operations (ERO) were conducting surveillance near 1894 Plimpton Avenue in Benton Harbor, Michigan, 49022 the last known address of OROZCO-ESTRADA. ERO also conducted database checks during surveillance that confirmed a blue Buick Encore (Michigan plate 2LMY59) was registered to OROZCO-ESTRADA at the Plimpton Avenue address.

10. At or around 0815 hours on March 28, ERO Grand Rapids observed individuals departing the residence via the back door. Some moments later, officers

saw the blue Buick Encore bearing MI license plate 2LMY59 with two visible occupants, leaving Plimpton Avenue and turning southbound onto Crystal Avenue. Officers followed the vehicle through the intersection of Crystal Avenue and East Britain Avenue before initiating a vehicle stop to identify the driver, based on reasonable suspicion that the individual was OROZCO-ESTRADA.

11. ERO Grand Rapids contacted the occupants of the vehicle and requested identification from the driver, who provided a Mexican Driver's License bearing the name Heber Israel LOPEZ-LEON with a date of birth of 01/04/1989 and a photograph of OROZCO-ESTRADA. Officers visually identified the driver as OROZCO-ESTRADA based on photographs contained in immigration benefit applications, Michigan Department of Corrections documents, and previous removal forms. Following positive visual identification, OROZCO-ESTRADA was asked to step out of the vehicle. OROZCO-ESTRADA was arrested by ERO Grand Rapids for violation of 8 U.S.C. § 1326(a) and (b)(2), Aggravated Felon Reentry.

12. ICE ERO Grand Rapids conducted subsequent record checks of the subject's fingerprints through the Next Generation Identification (NGI) and Automated Biometric Identification System (IDENT) systems. These systems identified him as Edgar OROZCO-ESTRADA with the following identifying information: date of birth XX/XX/1987¹, FBI# 575834CG6, FINS# 1144857235, and A# 204559349.

13. Based on my training and experience as a Deportation Officer for ICE

¹ OROZCO-ESTRADA's full date of birth is known to me.

ERO, and the information contained in this continuation, I believe that probable cause exists to believe that Edgar OROZCO-ESTRADA did reenter the United States after removal subsequent to a conviction for commission of an aggravated felony without the permission of the Attorney General or Secretary of Homeland Security, in violation of 8 U.S.C. 1326(a) & (b)(2).